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12 *Pro Hac Vice*

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14 CORPORATION

15 UNITED STATES DISTRICT COURT  
16 CENTRAL DISTRICT OF CALIFORNIA  
17 WESTERN (LOS ANGELES) DIVISION  
18 LOS ANGELES COUNTY  
19

20 PHOTOFIXITPRO, INC.,  
21 Plaintiff,  
22 v.  
23 COSTCO WHOLESALE  
24 CORPORATION,  
25 Defendant.

Case No. 2:22-CV-08955

**DECLARATION OF CORI  
GORDON MOORE IN SUPPORT  
OF DEFENDANT COSTCO  
WHOLESALE CORPORATION'S  
MOTION FOR ATTORNEYS' FEES  
AND COSTS**

1 I, Cori Gordon Moore, declare and state as follows:

2 1. I am an attorney serving as general corporate counsel for Defendant,  
3 Costco Wholesale Corporation ("Costco") in this case, and I make this declaration  
4 based on my personal knowledge and on the files and records in this case and those  
5 publicly available. Except as where stated, I make this declaration of my own  
6 personal knowledge and, if called as a witness, I could and would testify  
7 competently to the matters stated herein.  
8

9 **LITIGATION OF THIS MATTER**

10 2. Attached as **Exhibit 8** is a copy of my LinkedIn Profile, which  
11 summarizes my professional training and experience. I received my law degree  
12 from Seattle University School of Law in 1998 and was admitted to the Bar of the  
13 State of Washington the same year. I have been honored as a "Washington Super  
14 Lawyer" by *Washington Law & Politics* and by my peers for inclusion in *The Best*  
15 *Lawyers in America*. I was formerly a partner at Perkins Coie, LLP in its Seattle  
16 office before I separated my employment and became corporate counsel for Costco  
17 Wholesale Corporation, Inc. My hourly rate for this matter was \$778.00.

18 3. Costco is a national corporation and a sophisticated consumer of legal  
19 services.

20 4. I represented Costco in the arbitration with PhotoFixItPro, Inc. when I  
21 was a partner at Perkins Coie, LLP and have substantial knowledge about the  
22 disputes and the parties' arguments at arbitration. While I am admitted to the Bar  
23 of the State of Washington, I am not admitted to the Bar of the State of California.  
24 I asked counsel in California, Ms. Russell, to sponsor my pro hac vice application  
25 to allow me to appear in this Court.


26 5. Because of PhotoFixItPro's unusual procedural choice to initially file a  
27 Petition to Vacate the Arbitration Award (styled as a complaint) in lieu of a motion  
28



1 to vacate, this matter was scheduled for discovery and trial-related deadlines and  
2 hearings that were inapplicable to a suit involving the sole issue of whether to  
3 confirm or vacate an arbitration award. Costco had to file a responsive pleading, an  
4 affirmative Motion to Confirm, and an application for an order vacating and  
5 deferring typical discovery-related deadlines and hearings. Although this created  
6 additional legal work, Costco's procedural choices were necessary. Moreover, I  
7 corresponded with PhotoFixItPro's counsel extensively to adhere to Local Rule 7-3.

8  
9 6. The parties attempted but were unable to reach an agreement to settle  
10 Costco's attorneys' fees and costs as a final resolution of this matter. Attached as  
11 **Exhibit 9** is a true and correct copy of the email chains between me, Costco's  
12 counsel, and PhotoFixItPro, Inc.'s counsel regarding the meet and confer process.  
13 The emails speak for themselves.

14 Executed this 1st day of May, 2023 at Seattle, Washington. I declare under  
15 penalty of perjury under the laws of the United States and the State of Washington  
16 that the foregoing is true and correct.

17  
18 By:   
19 Cori Gordon Moore